

Collin Groebe  
1801 N. Pearl Street, Apartment 4006  
Dallas, Texas 75201  
Telephone: 708-642-7619  
Email: cgroebe@winston.com

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

VOYAGER DIGITAL HOLDINGS, INC., et  
al.

Debtors<sup>1</sup>.

Chapter 11

Case No. 22-10943 (MEW)

(Jointly Administered)

**Proof of Claim Number: 594**

**Asserted Claim Amount: \$73,420.46**

**RESPONSE OF COLLIN GROEBE TO ORDER (I) APPROVING (A) OMNIBUS  
CLAIMS OBJECTION PROCEDURES AND FORM OF NOTICE, (B) SUBSTANTIVE  
CLAIMS OBJECTIONS AND (C) SATISFACTION PROCEDURES AND FORM OF  
NOTICE AND (II) WAIVING BANKRUPTCY RULE 3007(E)(6) [Docket No. 1067]**

Collin Groebe, hereby submits this written response (the “Response”) to the Court’s  
*ORDER (I) APPROVING (A) OMNIBUS CLAIMS OBJECTION PROCEDURES AND FORM  
OF NOTICE, (B) SUBSTANTIVE CLAIMS OBJECTIONS AND (C) SATISFACTION  
PROCEDURES AND FORM OF NOTICE AND (II) WAIVING BANKRUPTCY RULE  
3007(E)(6) [Docket No. 1067]*. In support of its Response, Collin Groebe respectfully represents  
the following:

**REQUEST FOR PROOF OF CLAIM AMOUNT CLARIFICATION**

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital, Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

WHEREFORE, In *The Notice of Objection to Your Proof of Claim and Deadline to File a Response with the Bankruptcy Court*, it states that my Claim listed in the table at the end of the notice is a Disputed USD Claim and notes such Claim is to be modified and disallowed.

WHEREFORE, out of an abundance of caution, Collin Groebe respectfully requests that the Court recognize the asset amounts of Collin Groebe as of July 5, 2022 as set forth below and in the Proof of Claim attached hereto as **Exhibit A**.

<u><b>Asset</b></u>	<u><b>Amount</b></u>	<u><b>Price as of July 5, 2022</b></u>	<u><b>Dollar Amounts:</b></u>
BTC	1.622786	\$20,635.47	\$33,486.95
ETH	1.47623	\$1,114.18	\$1,644.79
USDC	37,957.67	\$37,957.67	\$37,957.67
VGX	1,275.38	\$0.26	\$331.05
Total:			\$73,420.46

WHEREFORE, Collin Groebe points out discrepancies between the “Claim Identifier” listed on 22-10943-mew Doc 1002 Filed 2/15/23 on Page 58 as “565” and the “Claim Identifier” listed in the email correspondence received on March 5, 2023 as “517”.

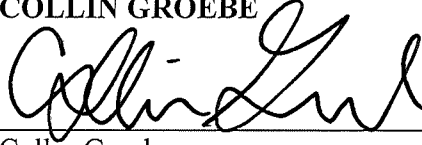
WHEREFORE, Collin Groebe points Claim Number of “594” is consistent.

**REQUEST FOR CLARIFICATION ON BINANCE SALE AND TRANSFER OF ASSETS**

WHEREFORE, Collin Groebe respectfully requests that the Court clarify the process for transferring assets to Binance.US for residents of the State of Texas. As I currently reside in the State of Texas, it is my understanding that Binance.US does not support Texas residents. Accordingly, for the benefit of all unsecured creditors, please make clear how the process is intended to work for myself and other unsecured creditors residing in the State of Texas.

Dated: March 7, 2023

**COLLIN GROEBE**



Collin Groebe  
1801 N. Pearl Street, Apt. 4006  
Dallas, Texas  
Telephone: (708) 642-7619  
Email: cgroebe@winston.com

With copies mailed to:

**Court:**

Judge Michael Wiles  
United States Bankruptcy Court Southern District of New York  
One Bowling Green  
New York, NY 10004-1408

**Debtors:**

Kirkland & Ellis LLP  
601 Lexington Avenue, New York, New York 10022  
Attn: Joshua A. Sussberg, P.C., Christopher Marcus, P.C., Christine A. Okike, P.C.,  
Michael B. Slade, and Allyson B. Smith;

**Committee:**

McDermott Will & Emery LLP  
One Vanderbilt Avenue, New York,  
New York, 10017-3852  
Attn: Darren Azman, Joseph B. Evans, Grayson Williams,  
Greg Steinman

**U.S. Trustee:**

The Office of the United States Trustee  
U.S. Federal Office Building,  
201 Varick Street, Suite 1006, New York, New York 10014,  
Attn: Richard Morrissey, Mark Bruh

**EXHIBIT A**

Proof of Claim

[See Attached]

## Fill in this information to identify the case:

Debtor Voyager Digital Holdings, Inc.United States Bankruptcy Court for the District of Southern District of New YorkCase number 22-10943

## Official Form 410

## Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

## Part 1: Identify the Claim

## 1. Who is the current creditor?

Collin Groebe

Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor \_\_\_\_\_

## 2. Has this claim been acquired from someone else?

☒ No☐ Yes. From whom? \_\_\_\_\_

## 3. Where should notices and payments to the creditor be sent?

Where should notices to the creditor be sent?

Where should payments to the creditor be sent? (if different)

Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Collin Groebe  
Collin Groebe  
1801 N PEARL ST, APT 4006  
DALLAS, TX 75201-3168  
United States  
P: 7086427619  
E: cgroebe@winston.com

Collin Groebe  
Collin Groebe  
1801 N PEARL ST, APT 4006  
DALLAS, TX 75201-3168  
United States  
P: 7086427619  
E: cgroebe@winston.com

Uniform claim identifier for electronic payments in chapter 13 (if you use one):  
\_\_\_\_\_

## 4. Does this claim amend one already filed?

☒ No☐ Yes. Claim number on court claims registry (if known) \_\_\_\_\_

Filed on \_\_\_\_\_

MM/DD/YYYY

## 5. Do you know if anyone else has filed a proof of claim for this claim?

☒ No☐ Yes. Who made the earlier filing? \_\_\_\_\_

6. Do you have any number you use to identify the debtor? ☒ No  
☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: \_\_\_\_\_

7. How much is a claim? \$ 73,420.46 Does this amount include interest or other charges?  
☐ No  
☒ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim?  
Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card  
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).  
Limit disclosing information that is entitled to privacy, such as health care information.  
Section 541(d) of the Bankruptcy Code. Debtor held my digital assets as a trustee and only had legal title and not an equitable interest in such property.

9. Is all or part of the claim secured? ☒ No  
☐ Yes. The claim is secured by a lien on property  
Nature of property  
☐ Real estate. If the claim is secured by the debtor's principal residence, file a Mortgage Proof of Claim Attachment (Official Form 410-A) with this Proof of Claim.  
☐ Motor vehicle.  
☒ Other. Describe: \_\_\_\_\_

Basis for perfection: \_\_\_\_\_

Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of property: \_\_\_\_\_

Amount of the claim that is secured: \_\_\_\_\_

Amount of the claim that is unsecured: \_\_\_\_\_ (The sum of the secured and unsecured amounts should match the amount in line 7.)

Amount necessary to cure any default as of the date of the petition: \_\_\_\_\_

Annual Interest Rate (when case was filed) \_\_\_\_\_ %

☐ Fixed  
☐ Variable

10. Is this claim based on a lease? ☒ No  
☐ Yes. Amount necessary to cure any default as of the date of the petition. \$ \_\_\_\_\_

11. Is this claim subject to a right of setoff? ☒ No  
☐ Yes. Identify the property: \_\_\_\_\_

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

A Claim may be partly priority and partly nonpriority. For example, law limits the amount entitled to priority.

☒ No

☐ Yes. Check one:

Amount entitled to priority

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

☐ Up to \$3,350\* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

☐ Wages, salaries, or commissions (up to \$15,150\*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

\*Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

### Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box

☒ I am the creditor.

☐ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this Proof of Claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt

I have examined the information in this Proof of Claim and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date & time 07/25/2022 at 01:12 pm PT

MM / DD / YYYY HH : MM

/s/Collin Z Groebe

Signature

Print the name of the person who is completing and signing this claim:

Name

Collin Z Groebe

First Name Middle Name Last Name

Title

Attorney

Company

Identify the corporate servicer as the company if the authorized agent is a servicer

Address

1801 N  
PEARL ST

Number Street

DALLAS TX 75201

City State ZIP Code

Contact phone

7086427619

Email

cgroebe@winston.com

**COLLIN GROEBE VOYAGER PROPERTY**

<u>Asset</u>	<u>Amount</u>	<u>Price as of July 5, 2022</u>	<u>Dollar Amounts:</u>
BTC	1.622786	\$20,635.47	\$33,486.95
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